



# STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC UTILITY CONTROL

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January 7, 2000

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Magalie Roman Salas  
Commission Secretary  
Federal Communications Commission  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

Re: File No. NSD-L-99-89, Petition of the Utah Public Service Commission's  
Petition for Delegation of Additional Authority to Implement Number  
Conservation Methods CC Docket No. 96-98, Implementation of the Local  
Competition Provisions of the Telecommunications Act of 1996

Dear Ms. Salas:

Enclosed please find one original and four copies of the Connecticut Department  
of Public Utility Control comments filed in the above noted proceeding.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

*Louise E. Rickard*

Louise Rickard  
Acting Executive Secretary

Enc.

cc: Al McCloud (2)

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of	)	
	)	
Petition of the Utah Public Service Commission	)	File No.
for Delegation of Additional Authority to	)	NSD-L-99-89
Implement Number Conservation Methods	)	
	)	
Implementation of the Local Competition Provisions	)	CC Docket No.
of the Telecommunications Act of 1996	)	96-98

COMMENTS OF THE CONNECTICUT  
DEPARTMENT OF PUBLIC UTILITY CONTROL

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FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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COMMENTS OF THE CONNECTICUT  
DEPARTMENT OF PUBLIC UTILITY CONTROL

I. Introduction

The Connecticut Department of Public Utility Control (CTDPUC) hereby files comments with the Federal Communications Commission (FCC or Commission) in the above noted proceeding in support of the Utah Public Service Commission's (UPSC) Petition for Additional Delegated Authority to Implement Number Conservation Measures (Petition). Specifically, UPSC requests authority to: (1) institute mandatory thousands block number pooling; (2) implement sharing of NXX codes in rate centers; (3) revise rationing measures and institute NXX lotteries (prior to adoption of area code plans or establishment of an area code relief date) to prolong the life of the existing 801 area code; (4) reclaim unused and reserved central office codes; (5) investigate whether any of these reserved central office codes can be reclaimed for future distribution without causing disruption to carriers' network operations; (6) maintain the current central office code rationing measures for at least six months after the implementation of all area code relief plans; (7) expand

porting; and (9) implement rate center consolidation. FCC December 1, 1999 Public Notice, p. 1

## II. Discussion

On October 25, 1999, UPSC petitioned the Commission requesting that it be provided the authority to implement various area code optimization measures in the State of Utah. UPSC states that on September 22, 1999, the North American Numbering Plan Administrator (NANPA) declared extraordinary jeopardy in the 801 area code even though UPSC believed the number blocks currently distributed in the 801 area code had been underutilized. NANPA also projected number exhaust in the 801 NPA during the first quarter, 2001. According to UPSC, based on conflicting information and its concern that exhaust may be exacerbated by the early-on telecommunications demands of the 2002 Winter Olympics, it now seeks authority to implement various number conservation measures. Petition, pp. 2 and 3.

CTDPUC supports the Petition and recommends that it be adopted by the Commission. UPSC has requested that it be delegated the authority to implement several optimization measures that seek to address the telephone number crisis in Utah. The Petition should be approved because UPSC is in a better position to determine what is in the best interest of Utah. CTDPUC believes that these proposals when collectively implemented, should provide an orderly approach to assign telephone numbers in a more efficient manner and prolong the introduction of new NPAs in Utah. CTDPUC notes that a number of UPSC's proposed conservation measures have been adopted and are in use in

other jurisdictions. For example, UPSC has requested authority to implement mandatory thousand number block pooling. Authority to implement mandatory thousand block number pooling has already been delegated to the States of, New York, Massachusetts, California and Florida. The inefficient manner in which telephone numbers are assigned (i.e., in 10,000 blocks), is clearly the underlying factor creating the NPA shortage today. Mandatory thousand block number pooling would provide for a more efficient use of telephone numbers and minimize the wasteful allocation of these limited resources. UPSC should be afforded the same opportunity as was previously provided in the above noted states.

CTDPUC also supports UPSC's request for the ability to reclaim unused and reserved central office codes as well as investigate whether any reserved central office codes can be reclaimed for future distribution without causing disruption to carriers' network operations. Given the need for numbers and surplus of previously assigned numbers, a requirement that carriers return any unused blocks of numbers in NXX codes should also be adopted as a means of slowing down the unnecessary assignment of numbers. Adoption of these measures alone should minimize the occurrence of code holders possessing excess number reserves.

Additionally, CTDPUC believes that UPSC should be provided with the ability to maintain rationing procedures for six months following area relief.

Delegation of such authority would be consistent with authority provided to the State of California. UPSC should be afforded the same authority.<sup>1</sup>

CTDPUC also believes that UPSC should be provided with the ability to order interim unassigned number porting because it would allow UPSC to provide for a more efficient assignment of telephone numbers and reduce the confusion often associated with the introduction of new NXXs in Utah. Similarly, expanding the deployment of permanent number portability will provide a greater number of consumers to “take” their telephone numbers with them as they move from one provider to another.

### III. Conclusion

UPSC has offered the Commission several area code optimization measures, that if adopted as proposed, would provide UPSC with the ability to slow the deployment of additional area codes and minimize the inconvenience, disruption and cost that is often associated with their implementation. Approval of the Petition will also provide UPSC with the flexibility to implement a number of optimization measures and provide it with the ability to impose stricter

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<sup>1</sup> See NSD File No. L-98-136, DA 98-2463, Order December 1, 1998.

requirements on those seeking codes requiring a more efficient use of the codes in their possession before additional ones are awarded. The Petition is in the public interest and should be adopted.

Respectfully submitted,

CONNECTICUT DEPARTMENT OF PUBLIC  
UTILITY CONTROL

Donald W. Downes  
Chairman

Glenn Arthur  
Vice-Chairman

Jack R. Goldberg  
Commissioner

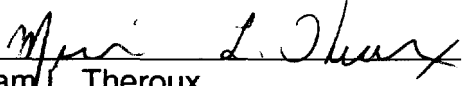
John W. Betkoski, III  
Commissioner

Linda Kelly Arnold  
Commissioner

January 7, 2000

Connecticut Department of  
Public Utility Control  
Ten Franklin Square  
New Britain, CT 06051

## CERTIFICATION

  
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Miriam L. Theroux  
Commissioner of the Superior Court